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Attorneys for Plaintiffs
 CRAIG YATES
 and DISABILITY RIGHTS
 ENFORCEMENT, EDUCATION,
 SERVICES: HELPING YOU
 HELP OTHERS

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

CRAIG YATES, an individual; and
 DISABILITY RIGHTS, ENFORCEMENT,
 EDUCATION, SERVICES:HELPING
 YOU HELP OTHERS, a California public
 benefit corporation,

Plaintiffs,

v.

I CAFÉ, TSO HIN FONG; and GEORGE
 K. SHAMIEH and KATHRYN SHAMIEH
 CO-TRUSTEES of THE FAMILY TRUST
 DATED 01/15/1994,

Defendants.

CASE NO. CV-09-1448-MEJ

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING TIME FOR
 DEFENDANT KATHRYN SHAMIEH
 CO-TRUSTEE OF THE FAMILY
 TRUST DATED 01/15/1994 TO
 RESPOND TO COMPLAINT**

Plaintiffs CRAIG YATES, an individual and DISABILITY RIGHTS, ENFORCEMENT,
 EDUCATION, SERVICES: HELPING YOU HELP OTHERS (“DREES”), and Defendant
 KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994, by and
 through their respective counsel, respectfully request and make the following stipulation:

1. Whereas, defendant KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY
 TRUST DATED 01/15/1994 was personally served with the summons and complaint on May
 7, 2009, an answer to the complaint is due on May 27, 2009;

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT KATHRYN SHAMIEH CO-TRUSTEE OF
 THE FAMILY TRUST DATED 01/15/1994 TO RESPOND TO COMPLAINT**

2. Whereas, defendant KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994 requested a 30-day extension to respond to plaintiffs' complaint;

3. Whereas, the parties are currently in negotiation to settle the above-referenced case, and wish to reduce fees, costs and litigation expenses in so doing. The parties need additional time to negotiate the terms;

4. Whereas, the parties believe it would be in the interests of efficiency and economy to extend the deadline for defendant KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994 to respond to the complaint, and to allow time to negotiate an agreement;

5. Whereas, defendant KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994 further stipulates that defendant will comply with any and all due dates dictated by the Federal Rules of Civil Procedure, the Local Rules of Court, and/or any scheduling order issued by this court prior to the date on which defendant's responsive pleading is due; and

6. Whereas, plaintiffs' have agreed to grant a 30-day extension of time for the defendant KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994 to respond to the complaint.

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STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994 TO RESPOND TO COMPLAINT

IT IS STIPULATED:

That the last day for Defendant KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994, to respond to the complaint shall be extended up to and including June 26, 2009.

Respectfully submitted,

DATED: May 27, 2009

THOMAS E. FRANKOVICH,
A PROFESSIONAL LAW CORPORATION

By: _____/S/_____
Thomas E. Frankovich
Attorneys for Plaintiffs CRAIG YATES and
DISABILITY RIGHTS ENFORCEMENT,
EDUCATION SERVICES: HELPING YOU
HELP OTHERS

DATED: May 27, 2009

RAMI S. SHAMIEH,
Shamiyeh & Shamieh Attorneys at Law

By: _____/S/_____
Attorneys for Defendants TSO HIN FONG; and
GEORGE K. SHAMIEH and KATHRYN
SHAMIEH CO-TRUSTEES of THE FAMILY
TRUST DATED 01/15/1994

ORDER

IT IS HEREBY ORDERED that Defendant KATHRYN SHAMIEH CO-TRUSTEE OF THE FAMILY TRUST DATED 01/15/1994 is granted an extension of time to and including June 26, 2009, to answer or otherwise respond to plaintiffs' complaint.

DATED: June 1, 2009



HON. MARY ELLEN JAMES
United States Magistrate Judge

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**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT KATHRYN SHAMIEH CO-TRUSTEE OF
THE FAMILY TRUST DATED 01/15/1994 TO RESPOND TO COMPLAINT**

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